

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS AMERICA
MARKETING FSI L.L.C., and NEWS
AMERICA MARKETING IN-STORE
SERVICES L.L.C.,

Defendants.

Case No.: 19-cv-1820 MJD/BRT

JURY TRIAL DEMANDED

MEET AND CONFER STATEMENT

I, Y. Gloria Park, representing Plaintiff Insignia Systems, Inc., hereby certify that:

I met and conferred with the opposing party by:

Telephone conversations and email correspondence with Nicole Moen, Fredrikson
& Byron, P.A.,

On:

- May 5, 2020 (Telephone)
- May 7, 2020 (Email)
- May 14, 2020 (Email)
- May 22, 2020 (Email)
- May 29, 2020 (Telephone)
- July 1, 2020 (Email)

- July 7, 2020 (Email)
- July 15, 2020 (Email)
- July 22, 2020 (Telephone and Email)
- July 30, 2020 (Email)
- August 6, 2020 (Email)
- August 20, 2020 (Email)
- September 1, 2020 (Email)
- September 3, 2020 (Email)

Discussing the following:

The parties' respective positions on discovery, including their positions on Insignia's request that Defendants produce the deposition transcripts and exhibits of 19 of Defendants' witnesses who were deposed in *Valassis Communications, Inc. v. News Corp., et al.*, No. 17-cv-7378 (PKC) (S.D.N.Y.) ("*Valassis*"); the deposition transcripts of Defendants' witnesses who were deposed in prior cases and whose deposition materials were reproduced in *Valassis*; documents designated as trial and summary judgment exhibits in *Valassis* that hit on search terms negotiated in this case, with the exception of third-party documents so designated; and documents related to Defendant News Corporation's sale of Defendants News America Marketing to Charlesbank Capital Partners.

As a result of the meet and confer, the parties:

- ☒ Do not agree on the resolution of any part of the motion.

☐ Agree on all or part of the motion and request that the Court incorporate the following agreement in an Order:

Dated: September 8, 2020

Respectfully submitted,

/s/ Y. Gloria Park

SUSMAN GODFREY LLP
William Christopher Carmody (*pro hac vice*)
New York State Bar No. 4539276
bcarmody@susmangodfrey.com
Arun Subramanian (*pro hac vice*)
New York State Bar No. 4611869
asubramanian@susmangodfrey.com
Mark Musico (*pro hac vice*)
New York State Bar No. 5238001
mmusico@susmangodfrey.com
Y. Gloria Park (*pro hac vice*)
New York State Bar No. 5477047
gpark@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, New York 10019
Telephone: (212) 336-3330
Fax: (212) 336-8340

Alejandra C. Salinas (*pro hac vice*)
Texas State Bar No. 24102452
asalinas@susmangodfrey.com
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Fax: (713) 654-6666

Rachel S. Black (*pro hac vice*)
Washington State Bar No. 32204
rblack@susmangodfrey.com
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Telephone: (206) 516-3880
Fax: (206) 516-3883

NAPOLI SHKOLNIK PLLC
Hunter Shkolnik (*pro hac vice*)

New York State Bar No. 2031458
hunter@napolilaw.com
360 Lexington Avenue, 11th Floor
New York, New York 10017
Telephone: (212) 397-1000

BLACKWELL BURKE P.A.
Jerry W. Blackwell
Minnesota State Bar No. 186867
blackwell@blackwellburke.com
S. Jamal Faleel
Minnesota State Bar No. 320626
jfaleel@blackwellburke.com
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Telephone: (212) 343-3200
Fax: (212) 343-3205

Attorneys for Plaintiff Insignia Systems, Inc.